



**PEACOCK LAW P.C.**  
INTELLECTUAL PROPERTY LAW SERVICES  
TECHNOLOGY COMMERCIALIZATION

Deborah A. Peacock, P.E. <sup>1,2,3,4</sup>  
Janeen Vilven-Doggett, Ph.D. <sup>1,2</sup>  
Philip D. Askenazy, Ph.D. <sup>10</sup>  
Justin R. Jackson <sup>1,2,3,5,8</sup>  
Isaac Estrada <sup>1,2</sup>  
Jeffrey L. Squires, Of Counsel <sup>2,5,6</sup>  
Ryan Jennings Wityak <sup>2</sup>  
Justin R. Muehlmeier <sup>1,2</sup>  
Camille L. Martinez <sup>1,2,9</sup>  
Svitlana V. Anderson <sup>2</sup>  
Stephen A. Slusher, Of Counsel <sup>1,2</sup>  
Steve M. McLary, Of Counsel <sup>1,7</sup>

January 30, 2019  
FILED WITH ECF

U.S. and Foreign Intellectual Property  
Patents, Trademarks and Copyrights  
Licensing and Technology Commercialization  
Biotechnology and FDA Law  
Computer and Internet Law  
Art and Entertainment Law  
Trade Secrets and Policies  
Intellectual Property Litigation  
Corporate and Commercial Transactions  
Venture Capital and Due Diligence

Honorable Nicholas Garaufis  
United States District Judge  
U.S. District Court  
225 Cadman Plaza East  
Brooklyn, New York, 11201

Re: Zaxcom, Inc., v. Lectrosonics, Inc., Case No. 1:17-cv-03408-NGG-RER

Dear Judge Garaufis:

We represent Defendant Lectrosonics, Inc. in the above-referenced matter. I write in response to a request, conveyed by your law clerk a week ago, that the parties review Plaintiff Zaxcom, Inc.'s Amended Complaint, which was filed under seal, to determine whether the parties would agree that there was no longer a need to treat any of the contents of that pleading as confidential. I gather your request was prompted by consideration of the motion to dismiss for improper venue, or in the alternative to transfer, that is pending before the Court, and that it might facilitate or otherwise impact the Court's rendering decision on that motion.

Initially, I apologize for not having been able to more promptly respond to your request. The lawyers needed to consult with one another, and then with their clients, before we could respond to your request. We have done so, and are in agreement that Plaintiff's Amended Complaint, contains no information that either party requires to be kept confidential, and that Plaintiff's Amended Complaint may be unsealed and be part of the public record.

I have been authorized by Plaintiff's counsel to represent Plaintiff's concurrence with respect to the content of this letter, and to so indicate by showing the signature of Plaintiff's

<sup>1</sup> Registered U.S. Patent & Trademark Office

<sup>2</sup> Admitted New Mexico Bar

<sup>3</sup> Admitted Colorado Bar

<sup>4</sup> Admitted New York Bar

<sup>5</sup> Admitted Washington D.C. Bar

<sup>6</sup> Admitted Maryland, Virginia and Texas Bars

<sup>7</sup> Admitted Indiana and Ohio Bars

<sup>8</sup> Admitted Oklahoma Bar

<sup>9</sup> Admitted Arizona Bar

<sup>10</sup> Registered Agent, U.S. Patent & Trademark Office (non-attorney)

Albuquerque (Main Office)  
201 Third Street NW · Suite 1340  
Albuquerque, NM 87102-3368  
P.O. Box 26927 · Albuquerque, NM 87125-6927  
Telephone (505) 998-1500 · Fax (505) 243-2542  
www.PeacockLaw.com

New York  
488 Madison Avenue  
17th Floor · Suite 1700  
New York, NY 10022  
Telephone (877) 998-1506

Washington D.C.  
1850 M Street NW  
Suite 280  
Washington, D.C. 20036  
Telephone (877) 998-1506

Letter to Judge Nicholas Garaufis  
January 30, 2019  
Page 2

counsel, as well as myself and co-counsel for Defendant in this matter.

Respectfully submitted,

FOR ELECTROSONICS, INC.

PEACOCK LAW P.C.

By: /JLS/  
Jeffrey L. Squires  
201 Third Street NW  
Suite 1340  
Albuquerque, NM 87102  
Tel: (505) 998-6116  
Fax: (505) 243-2542  
Email: [jsquires@peacocklaw.com](mailto:jsquires@peacocklaw.com)

DAVID WOLFLAW pllc

By: /DBW/  
David B. Wolf (DW-2077)  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
Tel: (212) 485-9808  
Fax: (212) 485-9808  
Email: [david@davidwolflaw.com](mailto:david@davidwolflaw.com)

FOR ZAXCOM, INC.

CHIPPERSON LAW GROUP, P.C.

By: /RCC/  
Rita Chipperson  
163 Madison Avenue  
Suite 220-40  
Morristown, NJ 07960  
Tel: (973) 845-9071  
Fax: (973) 845-6176  
Email: [rcc@chippersonlaw.com](mailto:rcc@chippersonlaw.com)